



HIPAA Compliance Tool: HIPAA BASICS™ Update

TMA Privacy Office
June 2005

Agenda

- Introduction
- User Roles and Responsibilities
- Report Admin Functionality
- Enhanced Gap Analysis Details
 - Associating Gaps with a HIPAA Rule
 - Tagging Gaps for rolled up reporting
 - Requirement Notes
 - Enhanced Subscription Reporting

Training Objectives

- Upon completion of this training, you will be able to:
 - Identify use of HIPAA BASICS™
 - Describe user roles and responsibilities
 - Identify functionality of Report Admins at each level
 - Generate enhanced reporting as a Report Admin, Subscriber Admin, and Lead User
 - Identify enhanced Gap Analysis details

Introduction

- Target Audience: Individuals assigned Report Admin responsibility for using HIPAA BASICS™ for tracking HIPAA Compliance
- Length of Training:
 - 30 minutes

Introduction to HIPAA BASICS™

Use of HIPAA BASICSTM

- MHS HIPAA Security Integrated Project Team (IPT) is responsible for developing and executing the strategy for implementation and maintenance of the HIPAA Security Rule requirements throughout DoD
- MHS must be able to establish an initial baseline and track progress toward compliance with HIPAA Security requirements
 - Report on the state of MHS HIPAA Security at any point
- TMA Privacy Office has provided HIPAA BASICS[™] to track and document compliance with HIPAA Privacy and Security Rules
- Mandated for HIPAA Security on April 27, 2004
- Strongly recommended for HIPAA Privacy

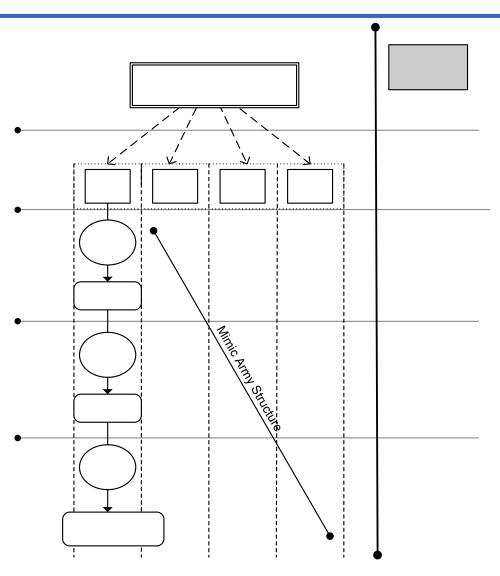
Introduction to HIPAA BASICS™ What is HIPAA BASICS™

- HIPAA BASICS™ is:
 - A web-based application
 - Used to collect, store, process data, and generate reports on HIPAA requirements
 - Assists you in identifying where compliance gaps exist and provides suggested compliance activities relating to HIPAA Administrative Simplification
- Accessible at <u>hipaacompliance.tricare.osd.mil</u>

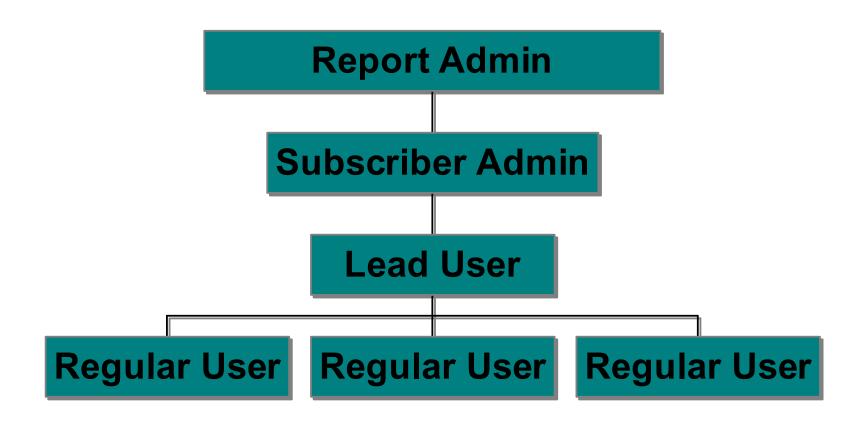
Objectives

- Upon completion of this lesson, you will be able to:
 - Describe the structure of subscriptions within HIPAA BASICS™
 - Identify users roles and responsibilities associated with:
 - Report Admin
 - Subscriber Administrator
 - Lead User
 - Regular User

High Level Hierarchy



Subscription Structure



User Roles within HIPAA BASICS™

- Report Admins are typically Privacy and Security Officers who are assigned the responsibility of generating rolled up compliance reporting
- Subscriber Administrators should be someone with an appropriate level of security clearance or access, preferably someone with a high level of comfort with technology, such as an IT professional
- Lead Users are generally high level managers, such as the Compliance Officer or Privacy/Security Officer
- Regular Users are the Subject Matter Experts (SMEs) in areas such as Medical Records

Report Admin Functions

- Run reports for organizations within their hierarchy (rolled up reporting)
- View profiles for Report Admins at the same level
- Ability to update profiles for subordinate Report Admins
- Login to Subscriptions
- Can have up to three Report Admins for each organization

Subscriber Administrator Functions

- Manage the tool administratively
- Create and edit user accounts within subscription
- View and edit all Gap Analysis across the subscription
- Add Gap Analysis for Lead Users within subscription
- Reassign Lead Users to Gap Analysis within subscription

Lead User Functions

- Manage compliance assessments
- Add members to a compliance assessment team
- Remove members from a compliance assessment team
- Assign requirements to team members
- Run reports and generate project plans
- Edit information related to their compliance assessments
- Download Policy and Form templates
- Assign gaps to a HIPAA rule
- Select gaps for rolled up reporting

Regular User Functions

- Address specific requirements to determine compliance
- View the work of other team members, however...
 - Can only answer requirement questions that are assigned to them by the Lead User

User Roles and Responsibilities Summary

- You should now be able to:
 - Understand the structure of subscriptions within HIPAA BASICS™
 - Identify users roles and responsibilities associated with:
 - Report Admin
 - Subscriber Administrator
 - Lead User
 - Regular User

Report Admin Functionality **Objectives**

- Upon completion of this lesson, you will be able to:
 - Identify functionality of Report Admins at each level
 - Describe the Report Admin interface
 - Generate High Level and Detailed Requirement Reports

Chart of Report Admin Functionality

<u>Function</u>	Level 0	Level 1	Level 2	Level 3
High Level Summary	Х	Х	Х	X
Detailed Requirement Report			X	X
View RA profiles on same level	X	X	X	X
Update subordinate RA profiles	X	X	X	X
View filtered Subscription lists		X	X	X
Sub Admin Subscription login			Х	Х

Report Admin Functionality Obtaining an Account

- Report Admin accounts are created by the HIPAA Support Center
 - An approved request for a Report Admin to be created must be routed to the HIPAA Support Center by the Service Representative, via the appropriate chain of command
 - Service Representatives must email the approved request to: hipaasupport@tma.osd.mil
- The HIPAA Support Center will email the appropriate Report Admin login information to the designated individual

Report Admin Login Information

- There are three pieces of information that must be known in order to login:
 - Organization
 - Report User ID
 - Password
- Upon logging in for the first time you will be prompted to change your password
- Passwords must meet the DoD requirements (refer to User Guide)

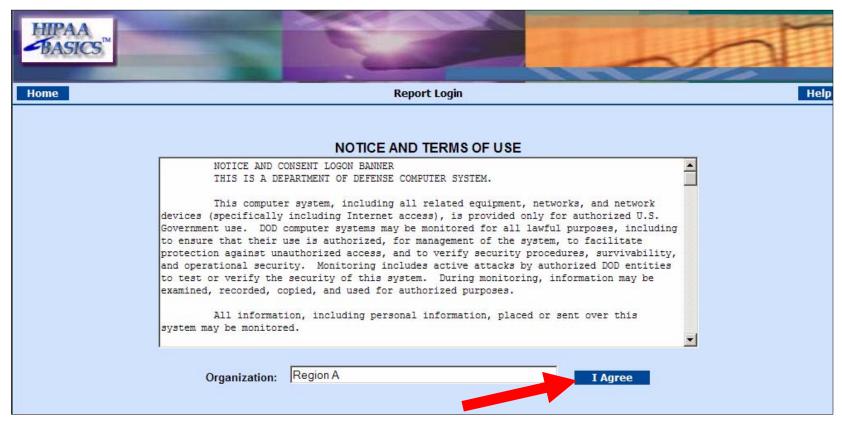
Report Admin Login (1 of 3)

- 1. Enter URL: hipaacompliance.tricare.osd.mil
- 2. Click on Report Administrators button



Report Admin Login (2 of 3)

- 3. Enter Organization
- 4. Click on I Agree

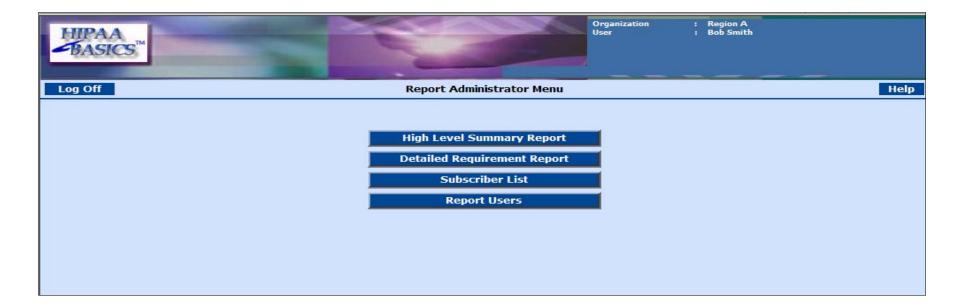


Report Admin Login (3 of 3)

- 5. Enter Report User ID and Password
- 6. Click on Login



Report Admin Menu



Report Admin Menu

- High Level Summary Report
 - Generate high level summary report for any subscription within their hierarchy
- Detailed Requirement Report
 - Generate detailed requirement report for any subscription within their hierarchy
- Subscriber List
 - View list of Subscriptions within the hierarchy
- Report Users
 - View and update report user profiles within the hierarchy

High Level Summary Report (1 of 5)

- New report developed to facilitate overall reporting at each level of the organization
 - Reports by completion of tasks and requirements
- Shows an overview of HIPAA Compliance efforts
- Available in both graphical and table format
- Can be run by Subscriber Administrators, Lead Users, and Report Admins
- Can only be generated for Gaps that have been assigned a HIPAA Rule and are tagged
- Report Admins are able to generate a rolled up report for all subordinates in their hierarchy

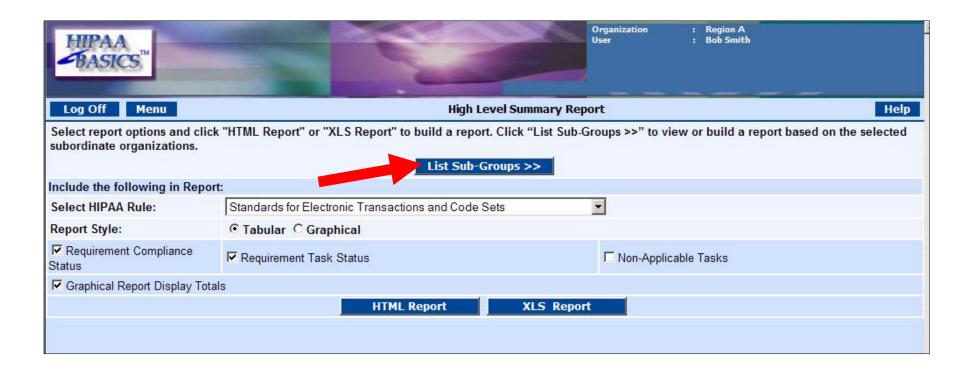
High Level Summary Report (2 of 5)

1. Click on High Level Summary Report button



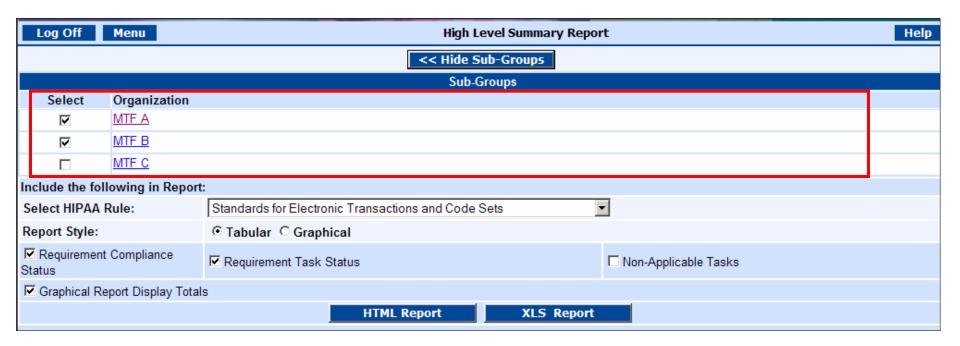
High Level Summary Report (3 of 5)

2. Click on List Sub-Groups button



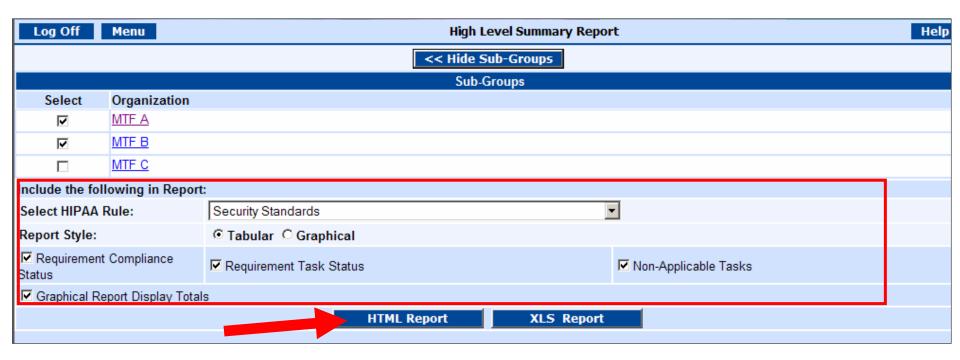
High Level Summary Report (4 of 5)

- Select the Organization link to drill down within your hierarchy
- 3. Select reporting organizations



High Level Summary Report (5 of 5)

- 4. Select HIPAA Rule
- 5. Select Report style and details
- 6. Click HTML Report or XLS Report



High Level Summary Report- Tabular (1 of 2)

High Level Summary Report

Organization Name and User	Report Date	HIPAA Rule
Region A (Bob Smith)	6/15/2005	Security Standards

Reporting Organizations: MTF A; MTF B

Non-Tagged Subscriptions: none

Summary Totals

	% Compliant	% Not Compliant	# Requirements	# Compliant	# Not Compliant		iant
Requirement Status	16.42	83.58	134	22	112		
	% Complete	% Not Complete	% Not Answered	# Tasks	# Complete	# Not Complete	# Not Answered
Requirement Task Status	15.75	0	84.25	1651	260	0	1391
Non-Applicable Task Status	% Non Applicable		Total # Tasks		# Non Applicable		

MTF A

High Level Summary Report- Tabular (2 of 2)

MTF A

	% Compliant	% Not Compliant	# Requirements	# Compliant	# N	Not Compl	iant
Requirement Status	19.4	80.6	67	13	54		
	%	% Not	% Not	# Tasks	#	# Not	# Not
	Complete	Complete	Answered		Complete	Complete	Answered
Requirement Task Status	18.8	0	81.2	803	151	0	652
	% Non Applicable		Total # Tasks		# Non Applicable		
Non-Applicable Task Status	9.67		889		86		

MTF B

	% Compliant	% Not Compliant	# Requirements	# Compliant	# N	Not Compl	iant
Requirement Status	13.43	86.57	67	9		58	
	% Complete	% Not	% Not	# Tasks	# Complete	# Not	# Not Answered
Requirement Task Status	12.85	0	87.15	848	109	0	739
% Non Applicable Total # Tasks # Non Applicable						able	
Non-Applicable Task Status	4.61		889		41		

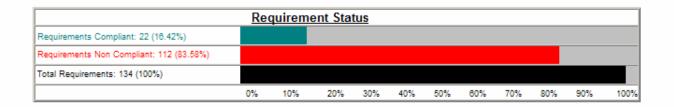
High Level Summary Report – Graphical

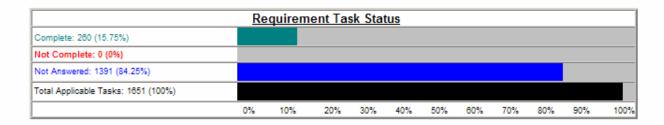
High Level Graphical Report

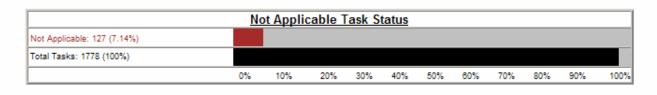
Organization Name and User	Report Date	HIPAA Rule
Region A (Bob Smith)	6/15/2005	Security Standards

Reporting Organizations: MTF A; MTF B

Non-Tagged Subscriptions: none







Detailed Requirement Report (1 of 3)

- Newly developed to show detailed compliance efforts at each level of an organization
- Shows a breakdown of the level of compliance for all requirements and tasks
- Can only be generated for Gaps that have been assigned a HIPAA Rule and are tagged
- Can be run by Subscriber Administrators, Lead Users, and Report Admins
- Report Admins are able to generate a rolled up report for all subordinates in their hierarchy
- Available in HTML or Excel

Detailed Requirement Report (2 of 3)

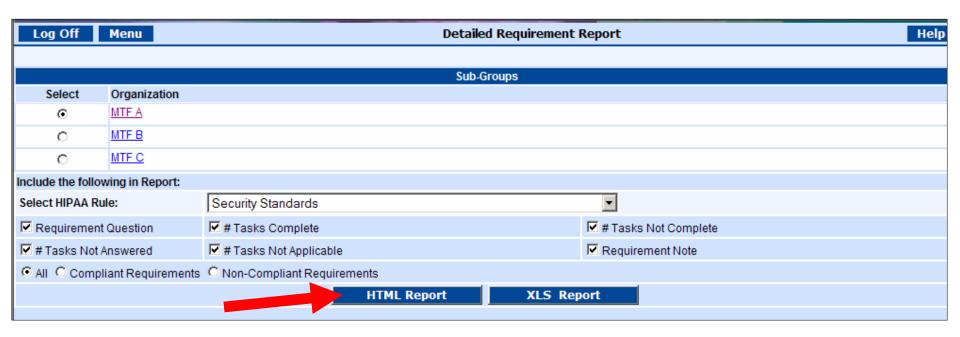
1. Click on the Detailed Requirement Report button



Report Admin Functionality

Detailed Requirement Report (3 of 3)

- 2. After selecting reporting organizations, Select the HIPAA Rule and report style
- 3. Click on HTML Report or XLS Report



Report Admin Functionality

Detailed Requirement Report Results

Detailed Requirement Report

Organization Name and User	Report Date	HIPAA Rule
Region A (Bob Smith)	6/15/2005	Security Standards

Reporting Organization: MTF A Non-Tagged Subscriptions: none

Req#	Req Question	Organization	Tasks% Complete	#Tasks Complete	#Tasks Not Complete	#Tasks Not Answered	#Tasks Not Applicable	Total #Tasks	Req Note	Compliant
107	A Security Management Process is implemented through policies and procedures to prevent, detect, contain, and correct security violations.	Training	100	20	0	0	0	20	N	N
Req#	Req Question	Organization	Tasks% Complete	#Tasks Complete	#Tasks Not Complete	#Tasks Not Answered	#Tasks Not Applicable	Total #Tasks	Req Note	Compliant
108	A Risk Analysis to assess potential risks and vulnerabilities to the confidentiality, integrity and availability of electronic PHI was conducted (R).	Training	100	19	0	0	0	19	Y	Y
Req#	Req Question	Organization	Tasks% Complete	#Tasks Complete	#Tasks Not Complete	#Tasks Not Answered	#Tasks Not Applicable	Total #Tasks	Req Note	Compliant
109	A Risk Management Process that implements security measures sufficient to reduce risks and vulnerabilities to a reasonable and appropriate level is in place (R).	Training	100	14	0	0	0	14	N	N
Req#	Req Question	Organization	Tasks% Complete	#Tasks Complete	#Tasks Not Complete	#Tasks Not Answered	#Tasks Not Applicable	Total #Tasks	Req Note	Compliant
110	A Sanction Policy to apply appropriate sanctions against workforce members who fail to comply with the security policies and procedures has been developed (R).	Training	100	7	0	0	0	7	Y	Y
Req#	Req Question	Organization	Tasks% Complete	#Tasks Complete	#Tasks Not Complete	#Tasks Not Answered	#Tasks Not Applicable	Total #Tasks	Req Note	Compliant
111	Information System Activity Review procedures to regularly review records of system activity, such as audit logs, access reports, and security incident tracking reports, are implemented (R).	Training	-	0	0	0	15	15	Y	Y
					#Toolso	#Toolea	#Toolso			

Report Admin Functionality **Summary**

- You should now be able to:
 - Identify functionality of Report Admins at each level
 - Describe the Report Admin interface
 - Generate High Level and Detailed Requirement Reports

Objectives

- Upon completion of this lesson, you will be able to:
 - Identify naming convention for Gaps
 - Assign Gaps to a HIPAA Rule
 - Tag Gaps for reporting
 - Describe importance of requirement notes
 - Generate enhanced reports at the Subscription level

Enhanced Gap Analysis Details Naming Convention

- Naming convention for Security Gaps:
 - Baseline Security MTF
 - Active Security MTF*
 - Security Q105 MTF

Assigning Gaps to a HIPAA Rule (1 of 3)

- Associates a Gap to a HIPAA Rule (Privacy or Security)
- Once assigned a HIPAA Rule, all other rules default to not-applicable
- All menus will default to the assigned HIPAA Rule
 - Eliminates sorting
- Current Gaps in the system have not been assigned a HIPAA Rule
 - Lead Users or Subscriber Administrators will need to assign Gaps as appropriate
- Gaps must be assigned to a HIPAA Rule for reporting purposes

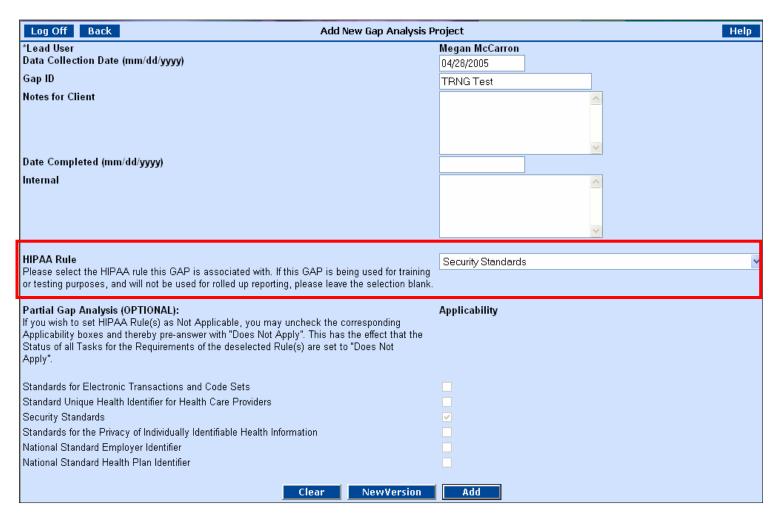
Assigning Gaps to a HIPAA Rule (2 of 3)

1. Click on the Add Gap button



Assigning Gaps to a HIPAA Rule (3 of 3)

Select the HIPAA Rule that the Gap is associated with

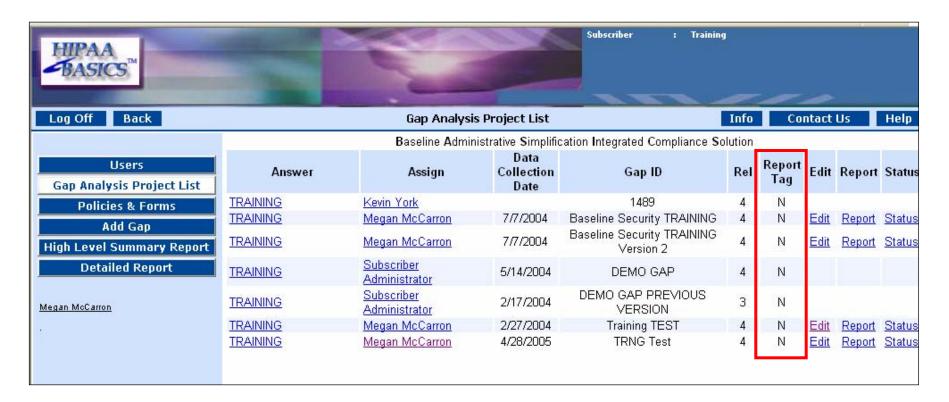


Tagging Gaps for Reporting (1 of 4)

- Gap Analysis that will be included in rolled up reporting must be tagged by the Lead User
- A Gap Analysis must be assigned a HIPAA Rule before it can be tagged for reporting
- Only one Gap Analysis per HIPAA Rule can be tagged for reporting

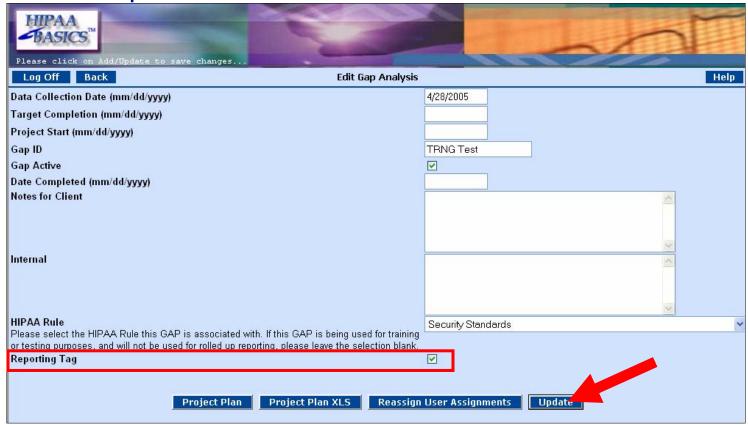
Tagging Gaps for Reporting (2 of 4)

Prior to Tagging Gaps for Reporting



Tagging Gaps for Reporting (3 of 4)

- 1. Select Edit from the Gap Analysis Project List screen
- 2. Check the box for Reporting Tag
- 3. Click Update



Tagging Gaps for Reporting (4 of 4)

Report Tag column will identify Gaps that are tagged for reporting

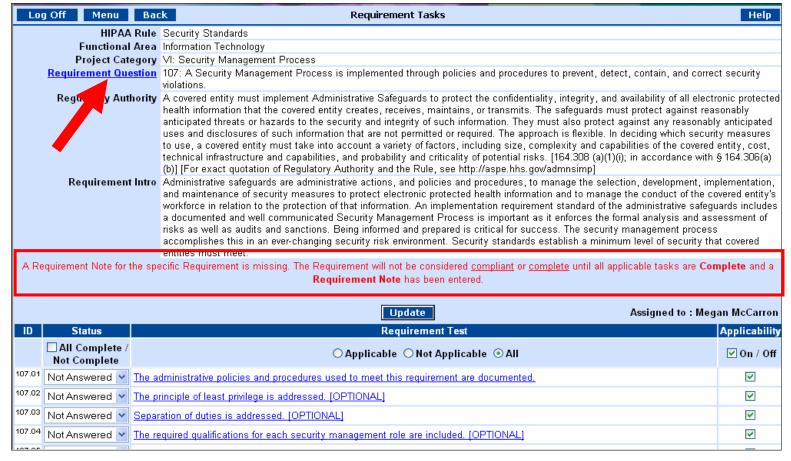


Requirement Notes (1 of 3)

- Requirement Notes are mandatory
- Users must enter a Requirement Note for each requirement in order to be compliant
- Red text indicating a Requirement Note has not been entered will appear on the Requirement Task screen

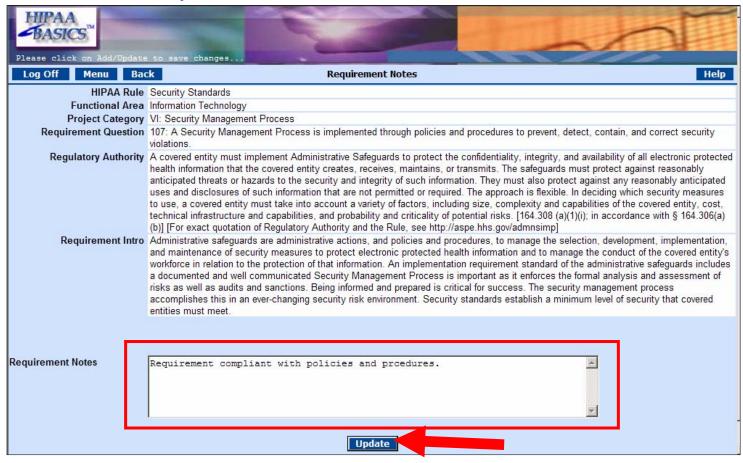
Enhanced Gap Analysis Details Requirement Notes (2 of 3)

- Red text indicates that a Requirement Note is missing
- 1. Select Requirement Question link to enter a note



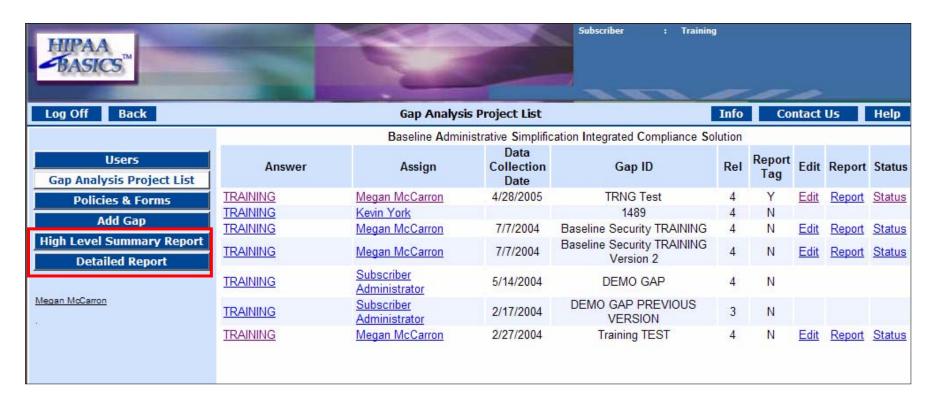
Enhanced Gap Analysis Details Requirement Notes (3 of 3)

- 2. Enter a Requirement Note
- 3. Click on Update



Enhanced Subscription Reporting

- High Level Summary
- Detailed Requirement Report



High Level Summary Report

- 1. Select HIPAA Rule and Report Style
- 2. Click on HTML Report or XLS Report



High Level Summary Report- Tabular

High Level Summary Report

Organization Name and User	Report Date	HIPAA Rule
Training (Megan McCarron)	5/25/2005	Security Standards

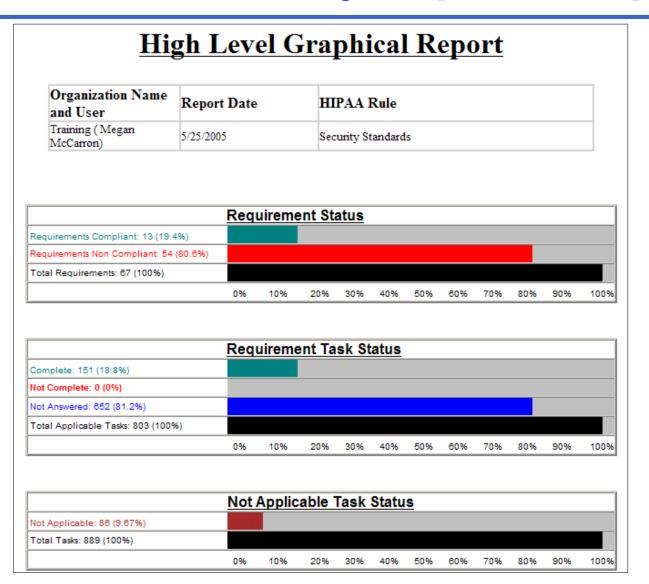
Gap ID: TRNG Test

Lead User: Megan McCarron

Summary Totals

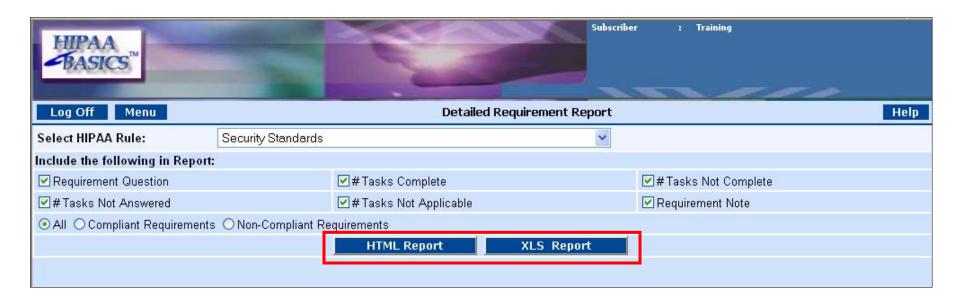
	% Compliant	% Not Compliant	# Requirements	# Compliant	# N	# Not Compliant		
Requirement Status	19.4	80.6	67	13	54			
	% Complete	% Not	% Not Answered	# Tasks	# Complete	# Not Complete	# Not Answered	
Requirement Task Status	18.8	0	81.2	803	151	0	652	
	% Non Applicable		Total # Tasks		# Non Applicable			
Non-Applicable Task Status	9.67		889)	86			

High Level Summary Report- Graphical



Detailed Requirement Report

- 1. Select the HIPAA Rule and report style
- 2. Click on HTML Report or XLS Report



Detailed Requirement Report Results

Detailed Requirement Report

Organization Name and User	Report Date	HIPAA Rule
Training (Megan McCarron)	5/25/2005	Security Standards

Gap ID: TRNG Test

Lead User: Megan McCarron

D#	Req Question		#Tasks	#Tasks Not #Tasks Not #Tasks Not			Total	D N-4-	Complian
Keq#			Complete	Complete	Answered	Applicable	#Tasks	Req Note	Complian
107	A Security Management Process is implemented through policies and procedures to prevent, detect, contain, and correct security violations.	100	20	0	0	0	20	N	N
108	A Risk Analysis to assess potential risks and vulnerabilities to the confidentiality, integrity and availability of electronic PHI was conducted (R).	100	19	0	0	0	19	Y	Y
109	A Risk Management Process that implements security measures sufficient to reduce risks and vulnerabilities to a reasonable and appropriate level is in place (R).	100	14	0	0	0	14	N	N
110	A Sanction Policy to apply appropriate sanctions against workforce members who fail to comply with the security policies and procedures has been developed (R).	100	7	0	0	0	7	Y	Y
111	Information System Activity Review procedures to regularly review records of system activity, such as audit logs, access reports, and security incident tracking reports, are implemented (R).	-	0	0	0	15	15	Y	Y
112	A Security Official who is responsible for the development and implementation of the policies and procedures required by the Rule has been identified.	100	5	0	0	6	11	N	N
113	Policies and procedures to ensure that all members of the workforce have appropriate access to electronic protected health information, and to prevent those workforce members who do not have access from obtaining access to electronic protected health information are implemented.	-	0	0	0	18	18	Y	Y
114	Procedures for the Authorization and/or Supervision of workforce members who work with electronic protected health information or in locations where it	-	0	0	0	9	9	Y	Y

Summary

- You should now be able to:
 - Identify naming convention for Gaps
 - Assign Gaps to a HIPAA Rule
 - Tag Gaps for reporting
 - Describe importance of requirement notes
 - Generate enhanced reports at the Subscription level

Presentation Summary

- You should now be able to:
 - Identify use of HIPAA BASICS™
 - Describe user roles and responsibilities
 - Identify functionality of Report Admins at each level
 - Generate enhanced reporting as a Report Admin, Subscriber Administrator, and Lead User
 - Identify enhanced Gap Analysis details

Resources

- DoD 6025.18-R, "DoD Health Information Privacy Regulation", January 2003
- http://www.tricare.osd.mil/tmaprivacy/HIPAA.cfm
- privacymail@tma.osd.mil for subject matter questions
- hipaasupport@tma.osd.mil for tool related questions
- http://www.tricare.osd.mil/tmaprivacy/Mailing-List.cfm to subscribe to the TMA Privacy Office E-News
- HIPAA Service Privacy/Security Representatives